ERIC W. SWANIS, ESQ. Nevada Bar No. 6840 2 STEPHANIE D. BEDKER, ESQ. Nevada Bar No. 14169 GREENBERG TRAURIG, LLP 3773 Howard Hughes Parkway, Suite 400 North 5 Las Vegas, NV 89169 Telephone: (702) 792-3773 6 Facsimile: (702) 792-9002 Email: swanise@gtlaw.com 7 bedkers@gtlaw.com 8 Counsel for Defendant/Third-Party Plaintiff 9 Enterprise Leasing Company-West, LLC 10 11 12 DISTRICT OF NEVADA 13 14 ROBERT M. GOGGIN, 15 Plaintiff, 16 ENTERPRISE LEASING COMPANY-WEST, 17 LLC, a Delaware Corporation; ABC 18 CORPORATIONS I-X, inclusive, BLACK AND WHITE COMPANIES, and DOES I-XX, 19 inclusive. 20 Defendants. 21 22 ENTERPRISE LEASING COMPANY-WEST, LLC, a Delaware Corporation, 23 Third-Party Plaintiff, 24 25 JAMES SIDNEY PROCTOR aka 26 JAMES HOOK, 27 Third-Party Defendant. 28

FILED RECEIVED **ENTERED SERVED ON** COUNSEL/PARTIES OF RECORD FEB 1 2 2018 **CLERK US DISTRICT COURT** DISTRICT OF NEVADA DEPUTY BY:

UNITED STATES DISTRICT COURT

Case No.: 3:17-cv-00262-HDM-VPC

(PROPOSED) ORDER GRANTING PERMISSION TO TAKE DEPOSITION AND OBTAIN RECORDS OF THE PERSON(S) MOST KNOWLEDGEABLE AND CUSTODIAN(S) OF RECORDS FOR THE DEPARTMENT OF THE U.S. NAVY

On February 6, 2018, Plaintiff, Robert M. Goggin ("Plaintiff"), and Defendant, Enterprise Leasing 1 Company-West, LLC ("Enterprise") (collectively, the "Parties"), presented before the Court at a Case 2 Management Conference ("CMC") in the instant action. Plaintiff appeared by and through his counsel of 3 record, William C. Jeanney and Drew Bradley, of the law firm Bradley, Drendel & Jeanney. Enterprise 4 appeared by and through its counsel of record, Eric W. Swanis, of the law firm Greenberg Traurig, LLP. 5 During the CMC, Enterprise requested the Court's permission to take the deposition and 6 obtain the records of the Person(s) Most Knowledgeable and Custodian(s) of Records for the 7 8 Department of the U.S. Navy. This Court, having considered the papers and pleadings on file, the oral arguments of 9 counsel, and for good cause appearing, 10 IT IS HEREBY ORDERED that Enterprise's request for permission to take the deposition 11 and obtain the records of the Person(s) Most Knowledgeable and Custodian(s) of Records for the 12 Department of the U.S. Navy is GRANTED. 13 Jehruary 12,20, IT IS SO ORDERED. 14 15 United States Magistrate Judge 16 Respectfully submitted by: 17 GREENBERG TRAUERG, LLP 18 19/14 ERIC W. SWANIS, ESQ. (NBN: 6840) 20 STEPHANIE D. BEDKER, ESQ. (NBN: 14169) 3773 Howard Hughes Pkwy., Suite 400N 21 Las Vegas, NV 89169 Counsel for Defendant/Third-Party Plaintiff 22 Enterprise Leasing Company-West, LLC 23 Approved as to form and content: 24 BRADILEY, DRENDEL & JEANNEY 25 26 WILLIAM C. JEANNEY, ESQ. (NBN: 01235) 27 P.O. Box 1987 Reno, NV 89505 28

Counsel for Plaintiff